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Department of Energy

Rocky Flats Office

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States Government

DATE 8-14-92

memorandum

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ACTION Kersh

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BENJAMIN, A

BERMAN, H S

BRADY, J A

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EVERED, J E

FERRERA, D W

GOODWIN, R

HANNI, B J

HEALY, T J

HILBIG, J G

IDEKER, E H

KERSH, J M

KIRBY, W A

KRIEG, D

KUESTER, A W

LEE, E M

MARX, G E

MORGAN, R V

PIZZUTO, V M

POTTER, G L

SANDLIN, N B

SATTERWHITE, D G

SCHUBERT, A I

SHEPLER, R L

SULLIVAN, M T

SWANSON, E R

MAN, K G

INSON, R B

WILSON, J M

ZANE, J O

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JUL 31 1992

WMED GSH 8280

Change in Pond Management and Discharge Regulations

J M Kersh

Associate General Manager
Environment and Waste Management
EG&G Rocky Flats, Inc

Attached is a letter we recently received from the Environmental Protection Agency (EPA) concerning the transition of pond management and discharges from the National Pollutant Discharge Elimination System, to regulation under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and/or the Resource Conservation and Recovery Act (RCRA). This issue was originally discussed with EPA at a meeting attended by the Department of Energy (DOE), EG&G, and the State of Colorado on December 19, 1991.

EPA intends to only permit the discharge from the Sewage Treatment Plant, and discharges of storm water before they enter the ponds, or the Woman or Walnut Creek drainages. All other pond discharges will be managed under CERCLA/RCRA through the Interim Measure/Interim Remedial Action (IM/IRA) process.

A report on pond management was requested from your office on June 12, 1992, and was due to DOE on June 26, 1992. We have not yet received the final report, in particular the regulatory analysis pertaining to CERCLA, RCRA, and the CWA regarding pond management, and the proposal outlining plans to ensure compliance with applicable regulations. In light of this notification from EPA, we would like EG&G to develop a conceptual approach to managing the ponds under an IM/IRA in the final report. This report should be forwarded to DOE by August 14, 1992.

If you have any questions concerning these comments, please contact Tom Lukow of my staff at extension 4561.

James K Hartman
Assistant Manager
for Environmental Management

Attachment

cc w/o Attachment
T Lukow, WMED, RFO
M Van Der Puy, EMB, RFO
J Dion, EMB, RFO
D Hauser, FMMEB, RFO
E M Lee, EG&G, EM
F Hobbs, EG&G, SWD

Reviewed for Addressee
Corres Control RFP

8-3-92

DATE BY

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